

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : SEALED
: INDICTMENT
:
- v. - :
: 22 Cr. _____
KEITH VEREEN, and :
STEVEN PEREZ, :
a/k/a "Lucha," :
:
Defendants. X

22 CRIM 644

COUNT ONE
(Firearms Trafficking Conspiracy)

The Grand Jury charges:

1. Between in or about May 2020, up to and including in or about November 2020, in the Southern District of New York and elsewhere, KEITH VEREEN, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, trafficking in firearms in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and an object of the conspiracy that KEITH VEREEN, the defendant, and others known and unknown, not being licensed importers, licensed manufacturers, and licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, would and did willfully and knowingly engage in the business of importing, manufacturing, and dealing in

firearms, and in the course of such business would and did ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, KEITH VEREEN, the defendant, together with others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about September 12, 2020, KEITH VEREEN, the defendant, received two wire transfers in the amounts of approximately \$600 and \$911 respectively, that were sent from a check cashing facility in the Bronx, New York.

b. On or about September 12, 2020, VEREEN purchased six firearms from a federal firearms licensee ("FFL") in South Carolina.

c. On or about September 14, 2020, VEREEN traveled from South Carolina to the Bronx, New York.

d. On or about September 22, 2020, VEREEN, the defendant, received a wire transfer in the amount of approximately \$350, sent from a check cashing facility in the Bronx, New York.

e. Between on or about October 1, 2020, and on or about October 2, 2020, VEREEN purchased five firearms from FFLs in South Carolina.

f. On or about October 3, 2020, VEREEN traveled from South Carolina to the Bronx, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Gun Trafficking)

The Grand Jury further charges:

4. Between in or about May 2020, up to and including in or about November 2020, in the Southern District of New York and elsewhere, KEITH VEREEN, the defendant, not being licensed importers, licensed manufacturers, and licensed dealers of firearms within the meaning of Chapter 44, Title 18, United State Code, would and did willfully and knowingly engage in the business of dealing in firearms, and in the course of such business would and did ship, transport, and receive firearms in interstate and foreign commerce, and travel interstate, in violation of Title 18, United States Code, Sections 922(a)(1)(A), to wit, VEREEN purchased and otherwise obtained firearms in South Carolina for resale in, among other places, New York.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1), and 2.)

COUNT THREE
(Interstate Transport of Firearms)

The Grand Jury further charges:

5. Between in or about September 2020, up to and including in or about November 2020, in the Southern District of

New York and elsewhere, STEVEN PEREZ, the defendant, not being a licensed importer, licensed manufacturer, licensed dealer, and licensed collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully and knowingly transport into or receive in the State where he resides firearms purchased or otherwise obtained by PEREZ outside that State to wit, PEREZ, a New York state resident who is not a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms, had at least one firearm transferred into New York from South Carolina on his behalf.

(Title 18, United States Code, Sections 922(a)(3), 924(a)(1),
and 2.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Count One, Two, and Three of this Indictment, KEITH VEREEN and STEVEN PEREZ, a/k/a "Lucha," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

7. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, KEITH VEREEN and STEVEN PEREZ, a/k/a "Lucha," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offense, including but not limited to the following:

- a. FN 503, 9mm handgun, Serial Number ("SN") CV006976;
- b. MC1 9mm pistol, SN 035736CP;
- c. Glock 43, 9mm handgun, SN ADWH603;
- d. Taurus G2C, 9mm handgun, SN ABDWH603;
- e. Glock 44, 22LR handgun, SN AELY222;
- f. Glock 19GEN4, 9mm handgun, SN ACMB656;
- g. Hellcat 9mm Pistol, SN BY306999;
- h. Taurus Poly Revolver, SN JZ20483;
- i. Beretta APX 9mm, SN AXC030812;
- j. Beretta APX 9mm, SN AXC030805;
- k. Springfield 9mm pistol, SN HG970741;
- l. Ruger LCR revolver, SN 154025585;
- m. Beretta 21A .22 pistol, SN BCS19935U;
- n. Smith & Wesson M&P 9mm handgun, SN JEV8303;
- o. Canik TP9 9mm handgun, SN 20CB25810;
- p. Taurus PT738 .380 handgun, SN 1D117214;
- q. Smith & Wesson 9mm handgun, SN JFC0427;

- r. SCCY Model CPX2 9mm handgun, SN C023420;
- s. Smith & Wesson M&P .380 handgun, SN RJB4429;
- t. Glock GMBH 9mm handgun, SN BRFT833;
- u. Mossberg MC1SC 9mm handgun, SN 034425C;
- v. Ruger LCR 38 revolver, SN 1541-34460;
- w. Glock GMBH 9mm handgun, SN AEYB797;
- x. Taurus G2C 9mm handgun, SN ABK021341;
- y. Canik TP9 9mm handgun, SN 20CB-33183.

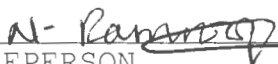
Substitute Assets Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KEITH VEREEN, and
STEVEN PEREZ,
a/k/a "Lucha,"

Defendants.

INDICTMENT

22 Cr. _____

(18 U.S.C. §§ 371, 922(a)(1)(A),
922(a)(3), 924(a), and 2.)

DAMIAN WILLIAMS
United States Attorney

N. Ramirez
Foreperson

Filed Sealed Indictment
Arrest Warrants issued

KL
11/30/22

Stewart D. Aron
U.S.M.